

Exhibit A

Exhibit A – Proposed Constructions and Supporting Intrinsic and Extrinsic Evidence

A. U.S. Patent No. 9,094,868

Term No.	Claim Term	Headwater’s Proposed Construction and Supporting Evidence	Defendants’ and Intervenor Defendants’ Proposed Construction and Supporting Evidence
1	“link partner” (claims 6, 8, and 33)	<p>No construction necessary; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’868 patent at Abstract, 1:19-36, 1:40-64, 3:43-4:2, 14:5-15:6, 15:55-16:15, 24:40-31:33, 33:19-44, 45:59-46:3, Figs. 8-11 and associated text.</p>	<p>“a device with which another device communicates (e.g., a UE or base station)”</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’868 Patent at 1:18-24, 25:56-60, 26:30-33, 45:59-46:3, 27:54-60, Figs. 1-21.</p> <p><u>Extrinsic Evidence</u></p> <p>Expert declaration of Stan McClellan; Hargrave, F., <i>Hargrave’s Communications Dictionary</i> (IEEE 2001); Newton, H., <i>Newton’s Telecom Dictionary</i> (2011); <i>Telecom Dictionary</i> (2007); <i>Webster’s New World Telecom Dictionary</i> (2008); ; Rutenbeck, J., <i>Tech Terms</i> (2006); U.S. Patent No. 9,258,103.</p>
2	“UE link” (claims 16, 17)	<p>No construction necessary; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p>	<p>“connection between UE and base station”</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’868 Patent at 25:16-24, 27:24-26, 27:36-39, cls. 16 and 17, Figs. 1-21.</p>

		'868 patent at Abstract, 1:19-36, 1:40-64, 3:43-4:2, 14:5-15:6, 15:55-16:15, 24:40-31:33, 33:19-44, 45:59-46:3, Figs. 8-11 and associated text.	<p><u>Extrinsic Evidence</u></p> <p>Expert declaration of Stan McClellan; Hargrave, F., <i>Hargrave's Communications Dictionary</i> (IEEE 2001); Newton, H., <i>Newton's Telecom Dictionary</i> (2011); <i>Telecom Dictionary</i> (2007); <i>Webster's New World Telecom Dictionary</i> (2008); ; Rutenbeck, J., <i>Tech Terms</i> (2006).</p>
3	<p>“wherein at least one of the plurality of positionings or the estimated at least one future positioning of the UE further comprises at least one of an error, an accuracy, a deformation, a velocity, an acceleration”</p> <p>(claim 23)</p>	<p>Not indefinite; no construction necessary; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'868 patent at Abstract, 1:19-36, 1:40-64, 24:40-31:33, Figs. 8-11 and associated text.</p>	<p>Indefinite under 35 U.S.C. § 112.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>Abstract, 1:19-27, 1:33-36, 1:40-64, 24:40-62, 28:9-32, 30:57-31:9, Fig. 8, cls. 1, 23.</p> <p><u>Extrinsic Evidence</u></p> <p>Expert declaration of Stan McClellan.</p>

B. U.S. Patent No. 9,413,502

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Defendants' and Intervenor Defendants' Proposed Construction and Supporting Evidence
1	directly to the first data network / directly with a first data network (claims 1, 28, 30, and 31)	No construction necessary; plain and ordinary meaning. <i>Supporting Evidence:</i> <u>Intrinsic Evidence</u> '502 patent at Abstract, 1:18-33, 1:37-2:11, Figs 1-16 and associated text.	No written description under 35 U.S.C. § 112. <i>Supporting Evidence:</i> Extrinsic Evidence Expert declaration of Stan McClellan; <i>Cambridge Dictionary</i> , available at https://dictionary.cambridge.org/us/dictionary/english/directly .
2	through a selectable one of to the second data network (claims 1, 28, 30)	Not indefinite; no construction necessary; plain and ordinary meaning. <i>Supporting Evidence:</i> <u>Intrinsic Evidence</u> '502 patent at Abstract, 1:18-33, 1:37-2:11, Figs 1-16 and associated text.	Indefinite under 35 U.S.C. § 112. <i>Supporting Evidence:</i> Extrinsic Evidence Expert declaration of Stan McClellan.
3	one or more second parameters of	Not indefinite; no construction necessary;	Indefinite under 35 U.S.C. § 112.

	<p>associated with the second data network</p> <p>(claim 19)</p>	<p>plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'502 patent at Abstract, 1:18-33, 1:37-2:11, Figs 1-16 and associated text.</p>	<p><i>Supporting Evidence:</i></p> <p>Intrinsic Evidence</p> <p>'502 Patent at 12:34-39.</p> <p>Extrinsic Evidence</p> <p>Expert declaration of Stan McClellan.</p>
4	<p>wherein the first parameter of the bUE device selection is based on a joint first parameter between at least two of the plurality of bUE devices</p> <p>(claim 20)</p>	<p>Not indefinite; no construction necessary; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'502 patent at Abstract, 1:18-33, 1:37-2:11, Figs 1-16 and associated text.</p>	<p>Indefinite under 35 U.S.C. § 112.</p> <p><i>Supporting Evidence:</i></p> <p>Extrinsic Evidence</p> <p>Expert declaration of Stan McClellan.</p>
5	<p>wherein the joint first parameter enables joint or simultaneous wireless communication on a shared resource block (RB) of at least two of the</p>	<p>Not indefinite; no construction necessary; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p>	<p>Indefinite under 35 U.S.C. § 112.</p> <p><i>Supporting Evidence:</i></p> <p>Intrinsic Evidence</p> <p>'502 Patent at cl. 23.</p> <p>Extrinsic Evidence</p> <p>Expert declaration of Stan McClellan.</p>

	plurality of bUE devices (claim 21)	'502 patent at Abstract, 1:18-33, 1:37-2:11, Figs 1-16 and associated text.	
6	further comprising selecting the plurality of bUE devices such that at least one of the one or more UE devices has an associated bUE, thereby enabling joint or simultaneous wireless communication over one or more shared resource blocks (RB) (claim 22)	Not indefinite; no construction necessary; plain and ordinary meaning. <i>Supporting Evidence:</i> <u>Intrinsic Evidence</u> '502 patent at Abstract, 1:18-33, 1:37-2:11, Figs 1-16 and associated text.	Indefinite under 35 U.S.C. § 112. <i>Supporting Evidence:</i> Intrinsic Evidence '502 Patent at cl. 23. Extrinsic Evidence Expert declaration of Stan McClellan.